

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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UNITED STATES DISTRICT COURT

for the

District of Arizona

Division

CV-23-580-PHX-DMF

Case No. _____

(to be filled in by the Clerk's Office)

Chinyere James-Opara, Stephen Brantley

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)



Yes

☐ NoNXRTBH Madera LLC,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Chinyere James-Opara, Stephen Brantley
445 S. Dobson Rd Apt 2039
Mesa, Maricopa County
Arizona, 85202
(219) 576-4026, (312) 802-1600
chinyereopara77@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name NXRTBH MAPERA LLC
 Job or Title (if known) 4
 Street Address 445 S. Dobson Rd, Mesa, AZ, 85202
 City and County Mesa, Maricopa
 State and Zip Code Arizona, 85202
 Telephone Number (480) 573-6410 or (480) 530-6437
 E-mail Address (if known) _____

Defendant No. 2

Name Luisana Valenzuela
 Job or Title (if known) Property Manager
 Street Address 445 S Dobson Rd
 City and County Mesa, Maricopa
 State and Zip Code Arizona, 85202
 Telephone Number (480) 827-8465
 E-mail Address (if known) Luisana.Valenzuela@livebh.com

Defendant No. 3

Name Samantha Cyrana
 Job or Title (if known) Assitant Manager
 Street Address 445 S Dobson Rd
 City and County Mesa, Maricopa
 State and Zip Code Arizona, 85202
 Telephone Number _____
 E-mail Address (if known) Samantha.Cyrana@livebh.com

Defendant No. 4

Name Scott Clark
 Job or Title (if known) Attorney
 Street Address 4222 E Thomas Rd Ste. 230
 City and County Phoenix, Maricopa
 State and Zip Code Arizona, 85018
 Telephone Number (602) 957-7877 or (602) 957-7876
 E-mail Address (if known) office@clarkwalker.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

USC 1702, USC 18 2071
12 CFR 330.5; 12 CFR 330.7, 15 USC 1635, 15 USC Chap. 41
12 CFR part 1026, 28 USC sec. 3123, UCC 3-104
28 USC 1602, 16 CFR 433.3, 6000, sec. 121(a)(b) 18 USC 196(a)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Stopped a business, home was not given back.
Deprivation of rights. Tort of law, commercial codes
Rent day to day, rentals of vehicles, pain and suffering

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Breach of contract, failure to provide proper disclosures, rights and violations disregarded by Madera, workers, and attorneys. knowingly obstructing correspondence. Samantha unlawful writ signing after payment rendered, denied, than discharged. Property not taken—

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Madera breached the contract first so compensatory damages of \$67,000 and counting, Consequential damages \$17,900 and counting. The pain and suffering, distress \$2,000,000, and rescission damages listed in counterclaim they ignored \$27,393.12 as liquidated damages

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/04/2023

Signature of Plaintiff

Printed Name of Plaintiff

Chingere Jones *Stephon Brantley*
 Chingere Jones: Opara, Stephon Brantley

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Defendants:

Lusiana Valenzuela

Samantha Cyrana

Scott M. Clark

A. 28 USC 1603-1610,

III Statement of Claim

with 5 days after rights to rescind was
given notice to Madera workers and attorneys.